



## U.S. Department of Justice

United States Attorney  
Southern District of New York

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Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, NY 10278

May 15, 2025

**BY ECF**

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Kaylen Rainey, S2 22 Cr. 91 (RA)***

Dear Judge Abrams:

The Government respectfully writes regarding materials related to Kaylen Rainey that were previously filed under seal. The Government and counsel for Rainey have conferred regarding what filings remained under seal—namely, the parties’ sentencing submissions—and what within those submissions should remain redacted. Accordingly, enclosed are minimally redacted copies of the Government’s sentencing submission, and Rainey’s sentencing submission (including its exhibits A, B, and C). The parties respectfully request that the minimal redactions still included therein remain under seal.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

cc: Zachary Taylor, Esq. (by ECF)

by: /s/ Micah F. Fergenson

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Enclosures

Application granted. Although there is a presumption of public access to judicial documents, it may be overcome in certain circumstances, such as when the materials pose a risk to the safety of witnesses, reveal the identities of non-parties or disclose medical information. *See Carson v. Fischer*, 421 F.3d 83, 89 (2d Cir. 2005); *Mirlis v. Greer*, 952 F.2d 51, 65 (2d Cir. 2020); *United States v. Sattar*, 471 F. Supp. 2d 380, 387 (S.D.N.Y. 2006). Because the proposed redactions are narrowly tailored to shield only those categories of information, the presumption of public access is overcome here.

SO ORDERED

Hon. Ronnie Abrams  
May 29, 2025